



**THE CITY OF NEW YORK
LAW DEPARTMENT**

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June 26, 2025

VIA ECF

Hon. Ramon E. Reyes, Jr.
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Collins v. City of New York et al.*
1:23-cv-9248 (RER) (PK)

Dear District Judge Reyes:

I am an Assistant Corporation Counsel in the office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, attorney for Defendants City of New York (“City”) and the New York City Department of Education (“DOE”) in the above-referenced matter. I write to respectfully request that Your Honor extend the deadline for Defendants to file their reply in further support of their Motion to Dismiss the Amended Complaint in this action from June 27, 2025 until July 8, 2025. Plaintiff consents to this extension request. This is Defendants’ second request to adjourn the deadline to file their reply; the Court previously granted Defendants an extension on June 5, 2025.

An extension of time is requested in both this case and the related case, *Hogan et al. v. City of New York et al.*, 1:23-cv-8727 (E.D.N.Y.), because on June 12, 2025, a week after receiving the first extension, I gave notice that I will be leaving this Office on July 11, 2025. While I continue to work diligently on Defendants’ reply briefs in both *Hogan* and *Collins*, I have also been bogged down by the necessary work I must perform in advance of my departure, including preparing case files for transfer to new attorneys. Given the *Hogan* Plaintiffs’ 47-page and the *Collins* Plaintiff’s 35-page memoranda of law in opposition to Defendants’ respective motions to dismiss, I respectfully request more time to properly address the Plaintiffs’ arguments.

Accordingly, I respectfully request an extension to allow me sufficient time to complete Defendants' reply. I thank the Court for its consideration and attention to this matter.

Respectfully submitted,

/s/ Steven E. Smith

Steven E. Smith
Assistant Corporation Counsel

cc: All Counsel of Record (via ECF)